

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

OPULENT TREASURES, INC.,

Plaintiff,

V.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE
A TO THE COMPLAINT,

Defendants.

Case No. 23-cv-01283

Judge Harry D. Leinenweber

Magistrate Judge Gabriel A. Fuentes

**PLAINTIFF’S MOTION FOR SANCTIONS UNDER FED. R. CIV. P. 11 AS A RESULT
OF BD’S FILING NOTICE OF CHARGING LIEN (ECF 30)**

Plaintiff OPULENT TREASURES, INC. (“Plaintiff”), by and through the undersigned counsel, and pursuant to Fed R. Civ. P. 11(b)(1)–(3) and (c) moves for sanctions against Brozynski & Dalton P.C. and its attorneys Katarzyna Brozynski and Bart Dalton (collectively, “BD”) as a result of BD’s filing of Brozynski & Dalton, PC’s Notice of Charging Lien (ECF 30) (“Notice of Charging Lien”). Plaintiff requests that the Court strike BD’s Notice of Charging Lien with prejudice under Rule 11(c)(4). Plaintiff also requests that the Court order BD to pay Plaintiff all reasonable attorneys’ fees and other expenses incurred by Plaintiff as a direct result of the filing of the Notice of Charging Lien, including attorneys’ fees and expenses incurred for the instant motion for sanctions under Rule 11(c)(4).

1. In support, Plaintiff files its supporting Memorandum.
2. Per the 21-day “safe harbor” provided in Rule 11(c)(2), Plaintiff served this Motion and supporting Memorandum upon BD on April 26, 2023, along with a Motion attached hereto as

Exhibit A, but did not file it or present it to the Court at that time. The Memorandum has not been changed except to update the date for the instant filing.

Dated: May 18, 2023

Respectfully submitted,

THOITS LAW

By: /s/David E. Hutchinson
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*Attorneys for Plaintiff
Opulent Treasures, Inc.*

CERTIFICATE OF SERVICE

I, David E. Hutchinson, an attorney for Plaintiff OPULENT TREASURES, INC., hereby certify that on May 18, 2023, I filed the foregoing Plaintiff's Motion for Sanctions under Fed. R. Civ. P. 11 as a Result of BD'S Filing Notice of Charging Lien (ECF 30), as well as the accompanying Memorandum of Law in Support, with the Clerk of the Court via the Court's ECF system and served the foregoing, upon counsel for Brozynski & Dalton PC, via FedEx mailing to the addresses noted below.

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/s/David E. Hutchinson
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